

Confidential - Jon Dowling

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1 Q. What type of software does
2 TimeTrax use?
3 A. The TimeTrax today uses --
4 it's an online tool and uses
5 Microsoft.net technology.
6 Q. And who is -- is there a
7 database administrator or manager for
8 that?
9 A. The TimeTrax database, yes.
10 Q. And who would that be?
11 A. Tom McCarthy would be the
12 most likely DBA.
13 Q. And is there a business
14 consultant for TimeTrax?
15 A. Yes.
16 Q. Who would that be?
17 A. Rob Kauffman.
18 Q. And a client partner?
19 A. Ed Seidl, S-E-I-D-L.
20 Q. And the data sources for
21 TimeTrax?
22 A. TimeTrax receives -- it's
23 preconfigured by the operations team for
24 corporate holidays, and we interface with

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1 the HR system to provide leave of absence
2 and what they call bank vacation time.
3 Meaning it's time available to use as
4 banked vacation versus bigger vacation.
5 Q. Types of fields?
6 A. Fields, the territory -- are
7 you asking what is visible or what is
8 available total in the database?
9 Q. Let's start with what is
10 visible.
11 A. Depending on the role, the
12 PSS would pull it up and it wouldn't
13 display their territory as it was then.
14 It may display it, but it's not a field
15 of entry. They would be able to pick the
16 type of -- the tool allows them to pick
17 the type of time off territory and to
18 enter based on a preset calendar date put
19 in by day the amount of time they would
20 have been off territory in half day
21 increments. It's either .5 or 1.0. They
22 select that.
23 I'm thinking about that.
24 I'm not -- I do not believe they have any

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1 comments. They may have a comment -- if
2 they choose other, they may have a
3 comment.
4 Q. Fields that are not visible?
5 A. When I say "visible," in
6 this context, I'll call it the selectable
7 or things that you would use a drop down.
8 For a PSS, the territory code, the
9 employee ID of the PSS would not be
10 visible. I believe it's not visible at
11 all. And then, you know, underlying
12 system codes, you know, there is a
13 category called vacation. There may be a
14 code number, there is a code number
15 associated with that vacation, displayed
16 vacation value. That's on the PSS.
17 On the DSM or the sales
18 manager, the PSS' supervisor, they can
19 actually select a user for time on
20 territory and they select the -- they do
21 what they call coaching, and so if they
22 go out with a rep and coach them, they
23 select the territory and the PSS they
24 coach that day.

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1 Q. Can you describe the
2 coaching for me, your understanding of
3 it?
4 MR. TORREGROSSA: Objection.
5 Scope. That's outside of this
6 witness' knowledge with respect to
7 the 30(b)(6) testimony, but he can
8 answer if he knows on an
9 individual basis.
10 THE WITNESS: My
11 understanding of what coaching day
12 is, a sales manager would ride
13 with their sales reps and watch
14 them and understand how they're
15 doing their job and coach them on
16 doing their job.
17 BY MR. SMITH:
18 Q. And how would that be
19 reflected in TimeTrax?
20 A. It would be listed as a day
21 in which it would be basically they
22 coached that person that day.
23 Q. Would it include comments by
24 the supervisor, suggestions for

22 (Pages 357 to 360)

1 improvement?
 2 A. Not in TimeTrax.
 3 Q. In some other system?
 4 A. Yes.
 5 Q. What system would have those
 6 comments?
 7 A. The field coaching form.
 8 Q. The field coaching form. We
 9 haven't talked about that one before.
 10 Let me finish with TimeTrax and then
 11 we'll come back to the field coaching
 12 form.
 13 With regard to TimeTrax, are
 14 there any training modules for this
 15 program?
 16 A. There is training
 17 documentation for TimeTrax.
 18 Q. Is there other documentation
 19 for TimeTrax?
 20 A. Yes.
 21 Q. When was this system
 22 installed?
 23 A. TimeTrax was created during
 24 merger in 2000 and implemented in October

1 Q. And where is the server?
 2 A. In Southbury, Connecticut.
 3 The AstraZeneca data center.
 4 Q. Could you give us a screen
 5 scrape or a screen shot that would show
 6 what the graphical display looks like for
 7 this software?
 8 MR. TORREGROSSA: I object
 9 to the extent you're suggesting
 10 we'll produce such a thing, but
 11 you can answer the question.
 12 THE WITNESS: A screen shot
 13 could be made.
 14 BY MR. SMITH:
 15 Q. Could you do that for each
 16 of the applications we've talked about?
 17 MR. TORREGROSSA: Same
 18 objection. You can answer.
 19 THE WITNESS: A screen shot
 20 could be made.
 21 BY MR. SMITH:
 22 Q. Now, with regard to the
 23 field coaching form, is that a form
 24 suggested that is like one document? I

1 of 2000.
 2 Q. Is it backed up regularly?
 3 A. Yes.
 4 Q. Do you maintain those
 5 backups?
 6 A. Do I? IT services.
 7 Q. It's not IS, it's IT doing
 8 the backups?
 9 A. Yes, the group is called IT
 10 services.
 11 Q. So they -- do you know how
 12 long they're maintained?
 13 A. Not exactly sure. I believe
 14 they may be on a six-month rotation.
 15 Q. Unless they're retained
 16 specially, do you believe you could only
 17 go back six months to see what has
 18 happened in the past?
 19 A. My understanding in TimeTrax
 20 is we have the information dated back to
 21 October 1. TimeTrax is not a large
 22 database.
 23 Q. What type of database is it?
 24 A. It's Oracle.

1 assume there's more than a document, it's
 2 some sort of application?
 3 A. The field coaching form is
 4 an application.
 5 Q. Can you describe for me how
 6 it works?
 7 MR. TORREGROSSA: Let me
 8 just interpose an objection here.
 9 Scope-wise, certainly to the
 10 extent it's in the application,
 11 it's in the system, you're free to
 12 talk to him about those issues.
 13 To the extent it's a sales issue
 14 and about how they go about
 15 filling the form out and what
 16 their comments should be,
 17 obviously this witness is not
 18 qualified to talk about that. You
 19 can answer.
 20 THE WITNESS: The field
 21 coaching form is an application.
 22 It allows a district sales manager
 23 to enter information around the
 24 coaching activities they had with

1 the PSS. I don't know the
2 explicit categories here, but
3 there are explicit questions that
4 they would ask that are in the --
5 that are inherent in the form.
6 They're not free form. They're
7 structured.

8 BY MR. SMITH:

9 Q. Are there reports available
10 for the field coaching form system?

11 A. My understanding of the
12 usage of the field coaching form, they
13 are stored as individual forms.

14 Q. Who would be the -- would
15 there be a database administrator for the
16 field coaching form?

17 A. That would most likely be
18 Tom McCarthy.

19 Q. Who would be the business
20 consultant?

21 A. Her name escapes me at the
22 moment. I can see her face.

23 Q. You want to draw me a
24 picture? Who is the client partner?

1 A. A validated system record
2 would have information on the system
3 owners and validated system and the
4 people involved with it, with the
5 validation. Nonvalidated, it's
6 documentation of a system.

7 Q. The IS department doesn't
8 have some -- doesn't it have some sort of
9 data collection, a spreadsheet or
10 something that would list each of the
11 systems supported and who these people
12 are for each of these systems? You're
13 doing a great job from memory, I'm
14 impressed.

15 A. I'm truly answering your
16 question. No, there's not one source of
17 that information. That's the reaching
18 the -- remembering who each one would be.
19 And please keep in mind, things change
20 over time.

21 Q. Is there a vendor for the
22 field coaching form?

23 A. No, it's in-house.

24 Q. Is there documentation

1 A. Chuck Boohar.

2 Q. Who is the business owner?

3 A. I believe the business owner
4 would be David Massie, M-A-S-S-I-E.

5 Q. Data sources for the field
6 coaching form?

7 A. Chris Gabbard,
8 G-A-B-B-A-R-D, is the business
9 consultant.

10 Q. Thank you.

11 Would there be someplace
12 where you could obtain a listing of these
13 types of personnel for each of these
14 systems where you could go for a
15 particular system and it would list who
16 the database administrator, client
17 partner, business consultant and business
18 owner are for that system?

19 A. There is not a listing that
20 would give you all that information in
21 one place.

22 Q. Is there information like
23 that in the documentation for each of
24 these systems?

1 related to training?

2 A. I believe there would be
3 training documentation for a DSM on how
4 to use the form.

5 Q. Something on line or
6 something in writing?

7 A. I would not be able to
8 describe where it would be.

9 Q. When was the field coaching
10 form installed?

11 A. The field coaching form
12 application was piloted in December 2005
13 and rolled out completely in January
14 of 2006.

15 Q. Was there something similar
16 before that?

17 A. It's my understanding it was
18 all done on paper type forms or some
19 other method.

20 Q. What type of software is it?

21 A. Field coaching form is,
22 again, Microsoft.net technology.

23 Q. And where is it maintained?

24 A. The -- my organization.

1 Q. You have the server in
 2 Wilmington?
 3 A. The server is in Southbury,
 4 Connecticut.
 5 Q. Let's talk about
 6 SalesInsite. What type of program is
 7 that?
 8 MR. TORREGROSSA: Objection.
 9 Asked and answered.
 10 THE WITNESS: Sorry?
 11 MR. TORREGROSSA: You can
 12 answer.
 13 BY MR. SMITH:
 14 Q. What type of program is
 15 that?
 16 A. SalesInsite as described
 17 yesterday is somewhat of an information
 18 portal. It is a -- it's built on
 19 Microsoft Technologies and it's viewable
 20 within Outlook. Outlook today allows you
 21 to put this in there.
 22 Q. Is that S-I-G-H-T or
 23 S-I-T-E?
 24 A. S-I-T-E.

1 Asked and answered. Repetitive.
 2 THE WITNESS: Yes.
 3 BY MR. SMITH:
 4 Q. Who is that?
 5 A. Andy Nelson.
 6 Q. The business consultant?
 7 A. Rob Kauffman.
 8 Q. Client partner?
 9 A. Ed Seidl.
 10 Q. Business owner?
 11 A. I believe it would be Howard
 12 Kaplan. I don't know if he would agree.
 13 Q. Is there documentation over
 14 this program?
 15 MR. TORREGROSSA: Objection
 16 to the form.
 17 THE WITNESS: There are
 18 training documents for SalesInsite.
 19 BY MR. SMITH:
 20 Q. And when was it installed?
 21 A. As part of the merger. In
 22 2000.
 23 Q. Was there a legacy system?
 24 MR. TORREGROSSA: Objection.

1 Q. And what are the sources for
 2 SalesInsite, the data sources?
 3 MR. TORREGROSSA: Same
 4 objection.
 5 THE WITNESS: It allows you
 6 to view Outlook e-mail within
 7 Outlook, within it. The other
 8 sources of information are
 9 communications, documents sent out
 10 not via e-mail. It is -- it
 11 allows access to other tools like
 12 TimeTrax. You can submit a PIR.
 13 You can submit an AE via
 14 SalesInsite. And it has alerts
 15 that are provided to it to allow
 16 you to -- like I mentioned reports
 17 earlier that were in SalesInsite.
 18 If you got a report, you can get
 19 an alert that says your new
 20 reports are here.
 21 BY MR. SMITH:
 22 Q. Is there a database
 23 administrator?
 24 MR. TORREGROSSA: Objection.

1 Asked and answered. Answer it
 2 again.
 3 THE WITNESS: No.
 4 BY MR. SMITH:
 5 Q. We talked briefly about
 6 Touchstone Interactive yesterday and
 7 Touchstone Reporting. Can you compare
 8 and contrast and explain the difference?
 9 A. Touchstone Reporting is a
 10 delivery tool. As we spoke about, we
 11 used to provide an Excel spreadsheet of a
 12 report, of information. It's now
 13 provided in Touchstone Reporting. And it
 14 provides summarized and some detailed
 15 information relating to IMS script data
 16 and how a rep may be doing their calls
 17 and the execution, the calls that are
 18 made, things like that.
 19 Touchstone Interactive is
 20 a -- it's interactive promotions. It's a
 21 tool they use instead of hard copy when
 22 working with a doctor.
 23 Q. So the doctor -- I mean the
 24 PSS is displaying this on a laptop with

1 the doctor?
 2 A. It's a tablet PC. Yes.
 3 Q. Is that the same device that
 4 the PSS uses for Touchstone?
 5 A. Yes.
 6 Q. And who provides that
 7 software for Touchstone Interactive?
 8 A. That is Proscape.
 9 MR. TORREGROSSA: What is it
 10 again?
 11 THE WITNESS: Proscape is
 12 the company.
 13 BY MR. SMITH:
 14 Q. Who or what is Proscape?
 15 A. Proscape is the software. I
 16 believe the company name is also
 17 Proscape. Actually I'm pretty sure of
 18 that. What is it? What was the
 19 question?
 20 Q. That answers that question.
 21 That's fine.
 22 When was it installed?
 23 A. Proscape was first piloted
 24 in the fall of 2005.

1 MR. TORREGROSSA: You
 2 answered the question.
 3 BY MR. SMITH:
 4 Q. Who is the database
 5 administrator?
 6 A. That would be Tom McCarthy.
 7 Q. The client partner?
 8 A. Marie Weigand.
 9 Q. Business consultant?
 10 A. Cathy Panos.
 11 Q. The business owner?
 12 A. Jennifer McGovern.
 13 Q. Data sources?
 14 A. The information coming -- it
 15 would be coming from the warehouse, it
 16 would be sources like IMS and the
 17 summarized call information.
 18 Q. Examples of fields, types of
 19 fields?
 20 A. Information displayed in
 21 Touchstone Reporting would be things like
 22 script information. You could see things
 23 at a doctor level. You could see
 24 summarized information for your

1 Q. And what did they use before
 2 that?
 3 A. That would have all been
 4 paper based.
 5 Q. And who would be the
 6 business owner for Touchstone
 7 Interactive?
 8 A. I would say Christian
 9 Keller.
 10 Q. The database administrator?
 11 A. Andy Nelson.
 12 Q. Client partner?
 13 A. Jennie Duca.
 14 Q. Business consultant?
 15 A. Katie Krull.
 16 Q. For Touchstone Reporting,
 17 who is the provider of the software?
 18 A. It is built on another
 19 Siebel product called Siebel Analytics.
 20 Actually Disconnected Analytics is what
 21 it's called also.
 22 MS. RADLIFF: Dis what?
 23 THE WITNESS: Disconnected.
 24 There's a client version.

1 territory, district, region.
 2 Q. What type of documentation
 3 is available for this?
 4 MR. TORREGROSSA: Objection
 5 to the form. Go ahead.
 6 THE WITNESS: There is --
 7 they do this with computer-based
 8 training.
 9 BY MR. SMITH:
 10 Q. Who is responsible for that?
 11 A. Ultimately the business.
 12 They would work with the client partner.
 13 Q. When was that installed?
 14 A. Touchstone Reporting, it
 15 began pilot in the fall of 2005. Full
 16 roll-out completed in April of 2006.
 17 Q. What software or what
 18 systems track professional information
 19 requests?
 20 MR. TORREGROSSA: Objection.
 21 Scope. This is outside the
 22 witness' 30(b)(6) testimony, but
 23 you can answer, if he knows, on an
 24 individual basis. I'll also

1 interpose an objection asked and
2 answered yesterday. Go ahead.
3 THE WITNESS: The PIRs as
4 described are submitted and would
5 flow, to my understanding, to the
6 Webster system.

7 BY MR. SMITH:

8 Q. Do you have a cold storage
9 solution for e-mail?

10 MR. TORREGROSSA: I'm sorry?

11 BY MR. SMITH:

12 Q. A cold storage solution.

13 MR. TORREGROSSA: Objection
14 to form.

15 THE WITNESS: I will ask you
16 to explain your question.

17 BY MR. SMITH:

18 Q. It's not a term you're
19 familiar with?

20 A. Cold storage? No.

21 Q. You mentioned Accenture.
22 What other outside consulting firms does
23 AstraZeneca use for its information
24 management systems?

1 BY MR. SMITH:

2 Q. Minutes of meetings of the
3 management within the Commercial
4 department?

5 MR. TORREGROSSA: Objection.
6 Scope. It's outside this witness'
7 30(b)(6) testimony, but he can
8 answer on his individual basis if
9 he has knowledge.

10 THE WITNESS: I can't say
11 what meetings may have a minute.

12 BY MR. SMITH:

13 Q. I understand that.

14 A. There may be something.

15 Q. If they have minutes, is
16 there a shared drive where they would be
17 stored?

18 A. I cannot speak about how
19 they would manage those minutes and where
20 they would put them.

21 Q. Who would be able to tell us
22 about that?

23 A. I would suggest it would be
24 an individual -- on an individual basis

1 MR. TORREGROSSA: Objection.
2 Asked and answered.

3 THE WITNESS: Besides
4 Accenture, the ones I would work
5 with would be IBM, Cognizant and
6 Cieber, C-I-E-B-E-R.

7 BY MR. SMITH:

8 Q. What does Cognizant provide?

9 A. Cognizant provides the
10 development work for the Touchstone
11 reporting system.

12 Q. And what does Ceiber
13 provide?

14 A. Cieber provides the support
15 for ViewPoint and LectureBureau Express.

16 Q. Are there minutes of
17 meetings of management in the Commercial
18 department?

19 MR. TORREGROSSA: Objection.
20 Scope. It's not within this
21 witness' testimony. He can answer
22 if he has any knowledge.

23 THE WITNESS: I'm sorry,
24 could you repeat the question?

1 who is running the meeting. I could not
2 believe there is one person who could
3 tell that answer.

4 Q. Is there a system which
5 would list the participants in meetings?

6 A. If a meeting was scheduled,
7 and the participants that were invited
8 via Outlook calendar may -- would be in
9 Outlook.

10 Q. How far back do those
11 calendars exist in archive?

12 A. Calendar is part of Outlook
13 which is part of Mail which goes back to
14 June 2002.

15 Q. Do you have anything prior
16 to June 2002 for Outlook?

17 A. We do not.

18 Q. Did you have any other
19 e-mail system prior to 2002?

20 A. Prior to 2002?

21 Q. Prior to 2002.

22 A. Yes.

23 Q. What was that?

24 A. The e-mail systems prior to

1 merger, Outlook was implemented fully in
2 merger, the Astra organization used Lotus
3 Notes. The Zeneca organization used
4 Outlook for the sales force, that would
5 be the DSMs and PSSes, and Exchange for
6 headquarters. Prior to that, it would
7 have been MS Mail and I'll stop there.

8 Q. Do you know what system ICI
9 used?

10 A. I do not.

11 Q. What systems does
12 headquarters use today?

13 A. Outlook.

14 Q. So all of AstraZeneca uses
15 Outlook today?

16 A. All of AstraZeneca uses
17 Outlook today.

18 Q. Are the records from Astra's
19 Lotus system still available?

20 A. My understanding is that
21 information is not available.

22 Q. Is information from Zeneca's
23 Exchange system available today?

24 A. My understanding is that

1 spoke about earlier, it was a six-month
2 retention on mail, and it would have been
3 retented out, I guess would be the
4 expression. Is that a word?

5 Q. We'll take it as one.

6 Is there a separate IT or IS
7 division that supports Professional
8 Information Requests?

9 MR. TORREGROSSA: Again,
10 outside this witness' scope.

11 Answer on an individual basis if
12 you have knowledge.

13 THE WITNESS: Yes.

14 BY MR. SMITH:

15 Q. What is that division, what
16 is it and where is it?

17 MR. TORREGROSSA: Same
18 objection. Same instruction.

19 THE WITNESS: The SPKS
20 organization is my understanding.

21 BY MR. SMITH:

22 Q. And who is the person most
23 knowledgeable about SPKS?

24 A. Most knowledgeable about

1 information is not available.

2 Q. Is information from Zeneca's
3 Outlook system for the PSSes and DSMs
4 available today?

5 A. My understanding is that the
6 mail that is available is the Outlook
7 information for 2002.

8 Q. The merger was in 1999,
9 wasn't it?

10 A. The merger began in 1999.

11 Q. And was completed in 2000?

12 A. Yes.

13 Q. And what happened to
14 information between -- communications
15 information between 2000 and 2002?

16 MR. TORREGROSSA: Objection
17 to form. Vague. Do you
18 understand the question?

19 THE WITNESS: It doesn't
20 exist.

21 BY MR. SMITH:

22 Q. Do you know what happened to
23 it?

24 A. It wasn't required -- as we

1 SPKS would be John Pelkowski who heads
2 SPKS.

3 Q. Sometime prior to sending
4 information from a database to backup
5 storage, can it go to some other place or
6 application where it's easier to access
7 than the backup would be?

8 MR. TORREGROSSA: Objection
9 to form.

10 THE WITNESS: Could you
11 rephrase the question?

12 BY MR. SMITH:

13 Q. With regard to the systems
14 that you support, prior to backing up the
15 data, is it sometimes sent to another
16 server, another file or to another
17 application other than just being backed
18 up?

19 A. If I understand the
20 question, it's backed up, is the method
21 of backing up the information.

22 Q. Are copies of the data made
23 and kept anywhere else other than through
24 backup?

1 A. Not as far as any official
 2 backup policy to my knowledge. I
 3 couldn't speak if anything explicitly...
 4 Q. Who is the e-mail
 5 administrator?
 6 A. E-mail is managed through IT
 7 Services.
 8 Q. Is there a particular person
 9 who would be the manager of that?
 10 A. The person I would reference
 11 when talking about e-mail is Lynn
 12 Winkler. However, I don't believe you
 13 could call her the e-mail administrator.
 14 Q. Does your division provide
 15 any support to the finance department?
 16 A. We do not support finance.
 17 Q. Does your division provide
 18 any support for SAP?
 19 A. We do not support SAP.
 20 Q. Does your division deal with
 21 SAP as a source for some of the systems
 22 that you do administer?
 23 A. Only -- yes.
 24 Q. Which systems receive

1 Q. Commercial would have
 2 business plans, wouldn't they?
 3 MR. TORREGROSSA: Objection.
 4 Scope. You can testify to your
 5 individual knowledge if you have
 6 any.
 7 THE WITNESS: I would
 8 believe they would have a business
 9 plan.
 10 BY MR. SMITH:
 11 Q. But you're not aware of any
 12 system that you support that would handle
 13 those or manage those business plans?
 14 A. That is correct.
 15 Q. Where would the business
 16 plan be managed if you know?
 17 MR. TORREGROSSA: Same
 18 objection. Same scope issue.
 19 THE WITNESS: I would not
 20 know the system that would -- I
 21 cannot recall anything that would
 22 support that.
 23 BY MR. SMITH:
 24 Q. Who would be the person to

1 information from SAP?
 2 A. The data warehouse would
 3 receive summarized expense information
 4 related to the expenses submitted by
 5 sales.
 6 Q. Does your division -- strike
 7 that.
 8 Where are the AZ budgets
 9 kept?
 10 MR. TORREGROSSA: Objection
 11 to form and scope. I'm not sure
 12 that is within this witness
 13 30(b)(6) notice.
 14 THE WITNESS: Since we're
 15 not part of finance, I can't speak
 16 where that might be.
 17 BY MR. SMITH:
 18 Q. How about business plans?
 19 MR. TORREGROSSA: Same
 20 objection. Same scope.
 21 THE WITNESS: I cannot
 22 recall a system that may support
 23 business plans.
 24 BY MR. SMITH:

1 ask about SAP?
 2 A. My understanding of SAP,
 3 that question, it would not be -- it's a
 4 very broad system. I believe we spoke
 5 about it yesterday. It does --
 6 manufacture resource planning and finance
 7 functionality within the system. So
 8 there would be not one person that I
 9 could think of.
 10 Q. Would there be someone
 11 within Commercial who would be
 12 knowledgeable about their use of SAP?
 13 A. There may be. I would not
 14 be able to -- I wouldn't know who that
 15 person would be.
 16 Q. Do the systems you
 17 administer, are they linked to data
 18 sources outside of the United States?
 19 MR. TORREGROSSA: Could I
 20 have the question back?
 21 - - -
 22 (The court reporter read the
 23 pertinent part of the record.)
 24 - - -

1 MR. TORREGROSSA: As you
2 know, as part of the negotiation,
3 we took off the table any foreign
4 discovery of any type as part of
5 these 30(b)(6)s.

6 MR. SMITH: Well, I'm not
7 aware of that.

8 MR. TORREGROSSA: Well, I
9 will allow this limited answer to
10 this limited question. Do you
11 need it read back to you?

12 MR. SMITH: And I haven't
13 agreed to it in Delaware for sure.

14 MR. TORREGROSSA: Counsel,
15 it's on the first page of the
16 letter that's guiding this entire
17 30(b)(6). But in any event, I
18 will allow this limited question.

19 Can we have it read back,
20 please?

21 - - -

22 (The court reporter read the
23 pertinent part of the record.)

24 - - -

1 Q. If the business plans for
2 Commercial are not contained in the
3 databases that we've been talking about,
4 do you know if there -- if they're
5 maintained in some other application or
6 are they maintained in spreadsheets? Do
7 you know where they would be?

8 MR. TORREGROSSA: Objection.
9 Asked and answered. You can
10 answer again.

11 THE WITNESS: I would not
12 know where they would be.

13 BY MR. SMITH:

14 Q. We talked a little bit about
15 CSTP, I believe, yesterday. I wanted to
16 ask you a couple more questions about
17 that.

18 Can you tell me who the
19 business owner is for CSTP?

20 A. Mike Forst.

21 Q. And the database manager?

22 A. Andy Nelson.

23 Q. The client partner?

24 A. Sean Evans.

1 THE WITNESS: To my
2 knowledge, no. I am very focused
3 on the U.S. business and don't
4 recall things outside the scope of
5 the United States.

6 BY MR. SMITH:

7 Q. Are there foreign users who
8 have access to the systems that you
9 administer?

10 MR. TORREGROSSA: Again, I
11 will allow the answer to this
12 limited question. Is it foreign
13 users of these databases that we
14 talked about today?

15 MR. SMITH: Yes.

16 MR. TORREGROSSA: I will
17 allow that limited question to go
18 forward.

19 THE WITNESS: To my
20 knowledge, again, it's U.S.
21 business tools. I am not aware of
22 foreign users within the systems
23 that I support.

24 BY MR. SMITH:

1 Q. The business consultant?

2 A. Barb Kovacs.

3 Q. Is that an Oracle-based
4 system?

5 A. Yes.

6 Q. Is that accessed through
7 Touchstone?

8 A. I believe it can be. I'm
9 thinking about yesterday's statement and
10 I wasn't quite -- I may have said it. I
11 believe it can be.

12 Q. If not through Touchstone,
13 how can it be accessed?

14 A. It would be an application
15 on the user's laptop. It would be an
16 ICON.

17 Q. What is a SourceSafe
18 database?

19 A. A SourceSafe database is a
20 place where you will store the source
21 code or source information to manage your
22 applications. It's a repository to
23 ensure you have all the information to
24 change and the latest code available to

1 you.
2 Q. Can you pull the information
3 for any date or time from a SourceSafe
4 database?
5 MR. TORREGROSSA: Objection
6 to form.
7 THE WITNESS: My understanding
8 is yes.
9 BY MR. SMITH:
10 Q. Can you pull it for the
11 whole database?
12 MR. TORREGROSSA: Same
13 objection.
14 THE WITNESS: It would be
15 rather -- I believe you handed me
16 a rather extensive operation as
17 you would explicitly have to pull
18 every version out as a stand-alone
19 piece of information.
20 BY MR. SMITH:
21 Q. If you were to right click
22 on the latest project and say get latest
23 version, would that export everything
24 from BSS to a location on a disk?

1 collected and stored?
2 MR. TORREGROSSA: Objection
3 to form. Vague in scope. You can
4 answer on an individual basis.
5 THE WITNESS: Can you help
6 me understand what you might mean
7 by "management"?
8 BY MR. SMITH:
9 Q. Well, the people who head
10 the Commercial division, the people who
11 make decisions, business decisions for
12 the department?
13 MR. TORREGROSSA: Same
14 objection.
15 THE WITNESS: Once a
16 report -- if a report is created,
17 where they may store it as they're
18 looking at it, I would not be
19 familiar. In terms of the
20 Commercial headquarters based
21 organization, it's distributed to
22 them and they can store it for
23 their own access in those
24 locations we talked about.

1 MR. TORREGROSSA: Objection
2 to form. I'm not familiar with
3 the SourceSafe clicking, exactly
4 where to click to do what you just
5 described, so I couldn't
6 necessarily feel competent in
7 answering that.
8 BY MR. SMITH:
9 Q. Is there somebody in your
10 division that would be familiar with
11 that?
12 A. A developer.
13 Q. Which one?
14 A. Any developer who would use
15 SourceSafe to store the code would
16 probably most likely know the minute
17 usage of it.
18 Q. Is there a name of somebody,
19 one of the developers that would have
20 this information?
21 A. I would believe Jay Kent
22 would be able to answer that question.
23 Q. Do you know where reports
24 for management in Commercial are

1 BY MR. SMITH:
2 Q. Are there -- is there an
3 application that would allow a PSS to
4 search all published medical studies?
5 MR. TORREGROSSA: Objection.
6 Scope.
7 BY MR. SMITH:
8 Q. For Seroquel?
9 MR. TORREGROSSA: This is
10 not within this witness' 30(b)(6)
11 testimony. You can answer on an
12 individual basis.
13 THE WITNESS: I am not
14 familiar with any ability to do
15 that.
16 BY MR. SMITH:
17 Q. Are the PSSes able to search
18 through a limited collection of medical
19 studies on Seroquel, for example?
20 MR. TORREGROSSA: Same
21 objection.
22 THE WITNESS: Again, to
23 answer the question, I am not
24 familiar with how -- the